1/20/00

EPA Comments on
Proposed Changes to
CALFED Water Quality Program Plan
7 January 2000

Section 1.2 Vision - The new language proposed for the end of Section 1.2 that identifies CALFED's "solution methodology" for the Water Quality Program Plan (WQPP) places heavy emphasis on problem identification, research, modeling activities, but very little on actual actions to address problems directly. Add the following bullets to convey that CALFED intends to take actions beyond demonstration projects:

- Develop and implement management tools to address water quality problems
- Support other efforts to address identified problems

Section 1.4.1 (p. 1-9) - Replace proposed new paragraph for the end of the introduction with the following:

> CALFED is a cooperative planning effort involving many state and federal agencies with management or regulatory responsibilities for the Bay-Delta. Each participating agency bears its respective authorities and responsibilities, independent of CALFED efforts. One primary purpose of CALFED is to facilitate the collaborative and cooperative use of these authorities and responsibilities to better address the range of problems facing the Bay-Delta. CALFED does not possess independent, regulatory authority over water quality. Rather, CALFED relies upon those participating agencies with regulatory authority to exercise their respective responsibilities with regard to water quality. CALFED seeks to augment existing efforts to address water quality problems by providing: a forum to foster collaborative actions, funds for research and problem identification, support for demonstration projects and other directed actions, and incentives for carrying out management activities.

Section 2.4.2 - In the Response to Comments (Comment WQ-2.4.2-1), CALFED said that this section would be "modified in the last paragraph under the San Joaquin River near Stockton to include the most recent information on the progress of the study" (from the recent ERP grant funding source identification of oxygen depleting substances and causes in the San Joaquin River). There is no proposed modification to this section, however.

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Section 3.5.2, page 3-6 - Delete last two sentences of the second paragraph that refer to a possible Stage 3 regulation.

Section 6.4.3 - In the Response to Comments (Comment WQ-6.4.3-1), CALFED indicated that "a broader scope of programs will be included in this section" (including private sector research programs). No changes or additions have been proposed here.

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Section 7.5.1, p. 7-13 - This text adds language to describe and refer to the efforts under the Grasslands Bypass Project. We recommend the following alternative language as a replacement for the **first** paragraph for insertion (either in this Salinity Section or in the Selenium "Existing Activities" section on page 8-13):

> The Grasslands Bypass Project is an example of a successful program that has improved water quality. The Project enables the rerouting of agricultural drainage from a 97,000-acre area away from wetlands supply channels and into Mud Slough (and, ultimately, the San Joaquin River) via part of the San Luis Drain. The discharge, governed by a Use Agreement between the San Luis and Delta-Mendota Water Authority and the U.S. Bureau of Reclamation, is subject to Waste Discharge Requirements issued by the Regional Board which set limits on selenium discharges. The local water districts affected by the Project formed a regional drainage district which has enabled the growers to work together to reduce drainage and collectively manage and reduce selenium loads. While the primary emphasis of the Project has been on selenium load management, the efforts of the Grassland Area Farmers have also lead to reductions in the discharge of salts and boron from the area.

The second paragraph would remain the same as proposed.

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